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MAIL BRANCH

September 11, 1992

Mahn Partnership
Marjorie K. Mahn
RR 1 3003 540th St.
Alta, Iowa 51002

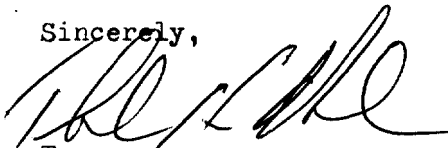
Secretary, Federal Communications Commission
1919 M. St.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Sir or Madam:

Enclosed herewith please find an original and four copies of a Counter-proposal and comments in Docket No. 92-155, RM8020, which our partnership is filing today.

Sincerely,


Theodore H. Mahn
partner

① + 4
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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

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SEP 14 1992

In the matter of

Amendment of Section 73.202(b)
Table of Allotments
FM Broadcast Stations
(Alta, Iowa)

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Docket No. 92-155
RM-8020

Counter-Proposal and Comments

This counter-proposal is filed as comments in Docket No. 92-155, RM8020 filed by Sunrise Broadcasting of Nebraska, Inc., which proposes that the FM Table of Allotments, Section 73.202(b) be amended to allocate channel 248A to Sac City, Iowa in lieu of channel 286A among other changes. Marjorie K. Mahn and Theodore H. Mahn, (the "Mahn partnership"), hereby request that channel 248A be allocated to Alta, Iowa in lieu of Sac City, Iowa. In support of this counter-proposal the following is respectfully submitted:

1. Alta, Iowa is an incorporated community located in Buena Vista County and is listed in the 1990 census with a population of 1,820 persons. This channel may be assigned to Alta without requiring any other changes in the Table of Allotments as this community's first local AM or FM service and is the only channel available. The Mahn partnership will file an application for a new FM broadcast service at Alta if the channel is allotted and construct the station if authorized.

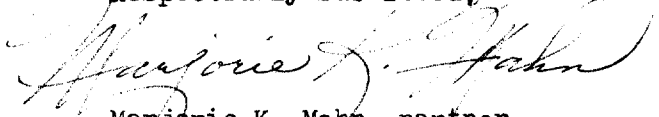
2. Channel 286A is now a vacant channel assigned to Sac City, Iowa. If channel 248A is allocated to Alta in lieu of Sac City, the community of Sac City will not lose its channel because there are two other channels that will work at Sac City as a result of the changes proposed by Sunrise. Channel 265A would require a site restriction of 15 Kilometres west-southwest when the Storm Lake channel is changed. Channel 284A would require a site restriction of 14 kilometres northeast when the Sac City allotment is changed. Use of either channel would provide city grade coverage over Sac City.

3. The Mahn partnership has attached a separation study and engineering statement prepared by Gallagher & Associates which indicates that channel 248A can be allotted to Alta consistent with section 73.207 of the Commission's rules.

4. The Mahn partnership has also attached a separation study which indicates the two alternate channels which would work at Sac City as a result of the changes proposed in Docket No. 92-155, RM8020.

5. Accordingly, the Mahn partnership requests that the Commission commence a rule making proceeding to allot channel 248A to Alta, Iowa as a first local service in lieu of its allocation to Sac City, Iowa and to assign either channel 265A or 284A to Sac City, Iowa.

Respectfully submitted,


Marjorie K. Mahn, partner
RR 1 3003-540th St.
Alta, Iowa 51002

GALLAGHER & ASSOCIATES

CONSULTING RADIO ENGINEERS

CLARKSVILLE, MD

ENGINEERING STATEMENT
IN SUPPORT OF A
PETITION FOR RULEMAKING
TO ADD FM CHANNEL 248A
TO ALTA, IOWA

This engineering statement was prepared on behalf of Mr. Ted Mahn, to accompany a Petition for Rulemaking to amend the Table of FM Channel Allotments, Section 73.202(b) of the FCC Rules, to add Channel 248A (97.5 MHz) to Alta, Iowa. This channel can be assigned to Alta without requiring any other changes in the Table of Allotments.

The 1990 Census reports the population of Alta, Iowa, as 1,820 persons, and that it is located in Buena Vista County (pop. 19,965). There are no FM channels allocated for use at Alta, and there are no AM or FM stations presently assigned.

Figure 1, attached hereto, is a listing of the nearest stations and/or assignments on channels pertinent to the use of Channel 248A at Alta. The geographic coordinates used for compiling Figure 1 are Latitude 42°40'25", Longitude 95°17'25" and are the same coordinates listed in the National Atlas for Alta, Iowa. The proposed channel can therefore be used at the center of the city with no specified site restriction.

I, Charles I. Gallagher, hereby declare under penalty of perjury that this engineering statement was prepared by me or under my direct supervision, I further state that I am a Consulting Radio Engineer, and a Registered Professional Engineer in the State of Maryland, No. 11415, that my qualifications are a matter of record with the Federal Communications Commission, having been presented on previous occasions. All data and statements contained herein are true and correct to the best of my knowledge and belief.


Charles I. Gallagher

August 5, 1992

GALLAGHER & ASSOCIATES

CONSULTING RADIO ENGINEERS

CLARKSVILLE, MD

Database: FCC 6/92

TABLE A

COMPUTERIZED SEPARATIONS STUDY
CENTER OF ALTA, IOWA
Reference Point: 42° 40' 25" 95° 17' 25"
BASED ON SEPARATIONS IN SECTION 73.207

Channel No. 248 as a Class A

CALL	LOCATION	STATUS	FILE NUMBER	CHANNEL	ERP	HAAT	AZM.	DIST.	REQ'D	CLEAR
KSEZ	SIOUX CITY, IA	LIC	BLH-890313KB	250C1	100	196	255.4	82.3	75	7.3
KHBT	HUMBOLDT, IA	LIC	BLH-4848	249A	3.00	84	85.4	89.0	72	17.0
KPAT	SIOUX FALLS, SD	LIC	BLH-780815AE	247C1	60	67	313.5	150.2	133	17.2
KRIT	CLARION, IA	LIC	BLH-870120KA	245C1	100	176	89.7	93.2	75	18.2
KDMI	DES MOINES, IA	LIC c	BLH-7505	247C1	115	137	131.0	169.3	133	36.3

Note: Distances are in kilometres

This report contains information compiled from a commercial data base service. Gallagher & Associates believes the service to be an accurate and current source of information. However, Gallagher & Associates shall not assume responsibility for erroneous or incomplete information in this report.

WARNING: Results are subject to change without notice.

FM Study for: 14.5 KM NE	FCC Database Date: 7/92	42-29-50
Location: SAC CITY, IA	Channel Class: A	94-50-41
Call City, State	Chan Class Freq kW Latitude Dist.	Required
Status Proponent	File Number HAAT Longitude Azm.	Clear (km)

Study For Channel 284 104.7 mHz

ALLOC	SAC CITY, IA	286 A	105.1	42-25-12	15.7	31	
DEL	SUNRISE BROADCASTING	RM-8020	0	95-00-18	237.0	-15.3	SHORT
	Use of 73.215 for short spacing requires:					29	-13.3 SHORT

PRM

ALLOC	SAC CITY, IA	286 A	105.1	42-25-12	15.7	31	
VAC	SUNRISE BROADCASTING	-84-231	0	95-00-18	237.0	-15.3	SHORT
	Use of 73.215 for short spacing requires:					29	-13.3 SHORT

8

KESYFM	OMAHA, NE	283 C	104.5	100.	41-18-25	164.63	165
LIC	SUNGROUP BROADCASTING	BLH-871230KI	331	96-01-37	217.0	-0.37	CLOSE

KKLSFM	SIOUX FALLS, SD	284 C	104.7	100.	43-43-46	228.1	226
CP	SOUTHERN MINNESOTA BR	BPH-870302NL	300	97-05-10	307.6	+2.1	CLOSE

APPL. MUST SPECIFY AT LEAST 100KW & 198M HAAT OR EQUIVALENT

KJJG	SPENCER, IA	285 A	104.9	3.00	43-09-24	75.8	72
LIC	AMERICAN RADIO MISSIO	BLH-781218AJ	91	95-04-53	345.3	+3.8	CLOSE

KEZT	AMES, IA	281 C	104.1	100.	41-54-09	102.0	95
LIC	BUNCE BROADCASTING CO	BLH-861229KC	308	93-54-15	130.1	+7.0	CLOSE

FM Study for: 15 KM WSW	FCC Database Date: 7/92	42-22-18
Location: SAC CITY, IA	Channel Class: A	95-09-30
Call City, State	Chan Class Fred kW Latitude Dist.	Required
Status Proponent	File Number HAAT Longitude Azm.	Clear (km)

)))))) Study For Channel 265 100.9 mHz (((((((

KAYLFM STORM LAKE, IA	268 C1 101.5 100.	42-37-56	28.9	75	
LIC NORTHWEST IOWA BROADCAST	BLH-851205KF	64	95-09-54	358.9	-46.1 SHORT
Use of 73.215 for short spacing requires:			73		-44.1 SHORT

KAYLFM STORM LAKE, IA	268 C1 101.5 100.	42-38-05	29.2	75	
CP NORTHWEST IOWA BROADCAST	BPH-910729IC	122	95-10-10	358.2	-45.8 SHORT
Use of 73.215 for short spacing requires:			73		-43.8 SHORT

KAYLFM STORM LAKE, IA	268 C1 101.5	42-38-05	29.2	75	
DEL SUNRISE BROADCASTING	RM-8020	0	95-10-10	358.2	-45.8 SHORT
Use of 73.215 for short spacing requires:			73		-43.8 SHORT

PRM

NEW EAGLE GROVE, IA	264 C3 100.7 25.	42-40-18	89.08	89	
APP MINN-IOWA CHRISTIAN B	BPH-911004ME	100	94-09-11	67.7	+0.08 CLOSE

KGBIFM OMAHA, NE	264 C 100.7 100.	41-03-10	169.9	165	
LIC GRACE COLLEGE OF THE	BLH-900612KB	354	96-11-35	210.8	+4.9 CLOSE

KLQL LUVERNE, MN	266 C 101.1 100.	43-48-24	180.8	165	
CP LUVERNE-SIOUXLAND, IN	BPH-870302IM	300	96-12-23	332.2	+15.8 CLEAR

CERTIFICATE OF SERVICE

I, Marjorie K. Mahn, do hereby certify that on this 11th day of September, 1992 I have placed in the U.S. Mail the foregoing "Counter-proposal and Comments" addressed to the following:

Mr. Michael Ruger
Chief, Allocations Branch
Federal Communications Commission
2025 M. Street, N.W., Room 8322
Washington, D.C. 20554

Leslie Shapiro
Allocations Branch
Federal Communications Commission
2025 M. Street, N.W. Room 8313
Washington, D.C. 20554

Howard J. Braun, Esq.
Rosenman & Colin
1300-19th St., N.W.
Washington, D.C. 20036
(Counsel to petitioner)



Marjorie K. Mahn